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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MARIA ELENA GARCIA, an individual;
ADRIEANA GARCIA, an individual; C.G., a
minor by and through his *guardian ad litem*
Maria Elena Garcia; S.G., a minor by and
through her *guardian ad litem* Maria Elena
Garcia; J.G., a minor by and through her
guardian ad litem Maria Elena Garcia; and
GLORIA GARCIA; an individual,
Plaintiffs,

v.

CITY OF FARMERSVILLE, a California
municipal entity; TULARE COUNTY, a
California municipal entity; CITY OF
VISALIA, a California municipal entity;
OFFICER EDUARDO CARRILLO, an
individual; OFFICER DIEGO CORONA, an
individual; OFFICER JEREME BROGAN, an
individual; OFFICER PAULINO
MANZANO, an individual; SERGEANT
RALPH VASQUEZ, JR., an individual;
LIEUTENANT JAY BROCK, an individual;
SERGEANT CARDENAS, an individual;
DEPUTY MATTHIAS HERNANDEZ, an
individual; DEPUTY TAYLOR HOBSON, an
individual; DEPUTY S. JAJYO, an
individual; DEPUTY JASON KENNEDY, an
individual; and DOES 1-100, inclusive,
Defendants.

Case No.: 1:21-CV-00482-JLT-EPG

[ASSIGNED TO THE HONORABLE JENNIFER L.
THURSTON]

**JOINT STIPULATION AND ORDER
ALLOWING PLAINTIFFS TO AMEND
THE COMPLAINT TO ADD
DEFENDANTS**

1 Plaintiffs, Maria Elena Garcia; Adrieana Garcia; C.G., a minor by and through his *guardian*
2 *ad litem* Maria Elena Garcia; S.G., a minor by and through her *guardian ad litem* Maria Elena
3 Garcia; J.G., a minor by and through her *guardian ad litem* Maria Elena Garcia; and Gloria Garcia
4 (collectively “Plaintiffs”) and Defendants City of Farmersville, Tulare County, City of Visalia,
5 Officer Eduardo Carrillo, Officer Diego Corona, Officer Jereme Brogan, Officer Paulino Manzano,
6 Sergeant Ralph Vasquez Jr., Lieutenant Jay Brock, Sergeant Cardenas, Deputy Matthias Hernandez,
7 Deputy Taylor Hobson, Deputy S. Jajyo, and Deputy Jason Kennedy (collectively “Defendants” and
8 together with Plaintiffs, the “Parties”), through counsel, stipulate to and hereby request an Order
9 allowing Plaintiffs to amend their complaint to add Defendants Wellpath, LLC, Tracia Anderson,
10 and Eric Krenz.

11 The above-named parties, through their counsel of record, so stipulate:

12 **Whereas**, The parties are still early within the discovery process and have identified
13 Wellpath, LLC, Tracia Anderson, and Eric Krenz as necessary Defendants to this action;

14 **Whereas**, the parties are all amenable to an amendment to Plaintiffs’ operative complaint
15 which will name Wellpath, LLC, Tracia Anderson, and Eric Krenz as Defendants;

16 **Whereas**, the parties agree that is amendment is not prejudicial to any party, the product of
17 undue delay, proposed in bad faith, or futile;

18 **Whereas**, there will be no other changes made to the current operative complaint;

19 **Whereas**, the parties respectfully request that this Court enter an Order allowing Plaintiffs
20 to amend their operative complaint to name Wellpath, LLC, Tracia Anderson, and Eric Krenz as
21 Defendants.

22 DATED: April 20, 2022

23 **MCMURRAY HENRIKS, LLP**

24 By: /s/ Justice Turner

25 **Yana G. Henriks, Esq.**
26 **Justice Turner, Esq.**

27 Attorneys for Plaintiffs, MARIA ELENA
28 GARCIA; ADRIANA GARCIA; C.G., a minor
by and through his *guardian ad litem* Maria Elena
Garcia; S.G., a minor by and through her *guardian*
ad litem Maria Elena Garcia; J.G., a minor by and
through her *guardian ad litem* Maria Elena Garcia;
and GLORIA GARCIA

1
2 Dated: April 19, 2022 Amy Myers, Deputy County Counsel

3
4 By: /s/ Kathleen Taylor (as authorized on April 19, 2022)
5 **Kathleen A. Taylor, Esq.**
6 **Amy I. Myers, Esq.**
7 Attorney for Defendant County of Tulare

8 Dated: April 19, 2022 LONGYEAR & LAVRA, LLP

9
10 By: /s/ Van Longyear (as authorized on April 18, 2022)
11 **Van Longyear, Esq.**
12 Attorney for Farmersville Defendants

13
14 Dated: April 19, 2022 HERR PEDERSEN & BERGLUND LLP

15
16 By: /s/ Leonard C. Herr (as authorized on April 19, 2022)
17 **Leonard C. Herr, Esq.**
18 Attorney for Defendant City of Visalia

ORDER

Pursuant to the parties' stipulation (ECF No. 65) and Federal Rule of Civil Procedure 15(a)(2), Plaintiff may file an amended complaint within fourteen (14) days of entry of this order.

IT IS SO ORDERED.

Dated: **April 20, 2022**

/s/ Eric P. Grogg
UNITED STATES MAGISTRATE JUDGE